

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

**X CORP.,**

**Plaintiff,**

**v.**

**WORLD FEDERATION OF  
ADVERTISERS, *et al.*,**

**Defendants.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No. 7:24-cv-00114-B**

---

**DEFENDANT WORLD FEDERATION OF ADVERTISERS’  
MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(2) AND 12(b)(3)**

---

**TO THE HONORABLE JANE J. BOYLE, UNITED STATES DISTRICT JUDGE FOR  
THE NORTHERN DISTRICT OF TEXAS:**

Comes now, Defendant World Federation of Advertisers (“WFA”), and hereby files its Motion to Dismiss Pursuant to FED. R. CIV. P. 12(b)(2) and 12(b)(3) (the “Motion”).<sup>1</sup> For the reasons set forth in its accompanying Brief Supporting World Federation of Advertisers’ Motion to Dismiss Pursuant to FED. R. CIV. P. 12(b)(2) and 12(b)(3) (the “Brief”), WFA requests that this Court dismiss Plaintiff X Corp.’s case against WFA on the basis that (1) this Court lacks personal jurisdiction over WFA and (2) the Northern District of Texas is an improper venue for this case.

Therefore, for the reasons set forth in its Brief, WFA respectfully requests that the Court grant its Motion in its entirety and dismiss the case against WFA because this Court lacks personal jurisdiction over WFA and the Northern District of Texas is an improper venue for this case.

---

<sup>1</sup> Subject to this Motion, WFA joins in Defendants’ Motion to Dismiss for Failure to State a Claim.

Dated: May 14, 2025

Respectfully submitted,

/s/ David C. Miller

**David C. Miller**

Texas Bar No. 24110114

dmiller@bradley.com

**William S. Snyder**

Texas Bar No. 00786250

wsnyder@bradley.com

**Samuel T. Acker**

Texas Bar No. 24100111

sacker@bradley.com

**BRADLEY ARANT BOULT CUMMINGS LLP**

Fountain Place

1445 Ross Ave., Suite 3600

Dallas, TX 75202

Phone: (214) 257-9800

Fax: (214) 939-8787

**Charles E. Elder** (admitted *pro hac vice*)

Tennessee Bar No. 038250

celder@bradley.com

**BRADLEY ARANT BOULT CUMMINGS LLP**

1221 Broadway, Suite 2400

Nashville, TN 37203

Phone: (615) 252-3597

Fax: (615) 252-6380

***Counsel for Defendant World Federation of  
Advertisers***

**CERTIFICATE OF SERVICE**

I certify that on May 14, 2025, the foregoing document was filed using the Court's CM/ECF system, which constitutes service to all attorneys of record who have registered for CM/ECF updates.

/s/ David C. Miller

David C. Miller